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Attorneys for Defendants
CITY OF FAIRFIELD AND ZACHARY SANDOVAL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CALVIN RUSH and JAYME RUSH,

Plaintiff,

v.

CITY OF FAIRFIELD, OFFICERS
ZACHARY SANDOVAL AND DUSTIN
JOSEPH,

Defendants.

Case No. 2:21-cv-01120-WBS-KJN

**STIPULATION AND ORDER TO EXTEND
DISCOVERY DEADLINES**

Hon. William B. Shubb

IT IS HEREBY STIPULATED, and respectfully requested, by and between Plaintiffs and Defendants by and through their designated counsel, that:

WHEREAS, on June 21, 2021, Plaintiffs filed their Complaint. (Doc. 1).

WHEREAS, on February 2, 2022, Defendants City of Fairfield and Zachary Sandoval filed their Answer. (Doc. 10).

WHEREAS, on March 16, 2022, the Court issued the case schedule (Doc. 12);

WHEREAS, the current discovery schedule is set as:

Designation of Expert Witnesses due by 2/7/2023
Discovery shall be completed by 4/11/2023
Motions shall be filed by 6/20/2023
Final Pretrial Conference set for 8/28/2023 at 01:30 PM
Jury Trial set for 10/31/2023

WHEREAS, Defendants City of Fairfield and Zachary Sandoval retained new counsel in January 2023;

WHEREAS, expert disclosures are due on February 7, 2023;

WHEREAS, discovery shall be completed by April 11, 2023;

WHEREAS, newly retained counsel for the City of Fairfield and Zachary Sandoval requires additional time to review the case and conduct its own discovery;

WHEREAS, the parties met and conferred and agreed to extend discovery dates and set case schedule as proposed below:

Designation of Expert Witnesses due by 5/1/2023

Discovery shall be completed by 6/5/2023

Motions shall be filed by 6/20/2023

Final Pretrial Conference set for 8/28/2023 at 01:30 PM

Jury Trial set for 10/31/2023

IT IS SO AGREED.

Respectfully submitted,

Dated: January 11, 2023

CASTILLO, MORIARTY,
TRAN & ROBINSON, LLP

By: /s/ Patrick Moriarty
PATRICK MORIARTY
JOHN ROBINSON
JOANNE TRAN
Attorneys for Defendants
CITY OF FAIRFIELD and ZACHARY
SANDOVAL

Dated: January 11, 2023

BERTRAND FOX ELLIOT OSMAN & WENZEL

By: /s/ Richard Osman
RICHARD W. OSMAN
Attorneys for Defendants
DUSTIN JOSEPH

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LAW OFFICE OF STANLEY GOFF

Dated: January 11, 2023

By: /s/Stanley Goff
STANLEY GOFF

Attorney for Plaintiffs
CALVIN RUSH and JAYME RUSH

CASTILLO, MORIARTY, TRAN & ROBINSON, LLP
75 Southgate Avenue
Daly City, California 94015

ORDER

IT IS SO ORDERED:

The dates are reset as follows:

Designation of Expert Witnesses due by 5/1/2023

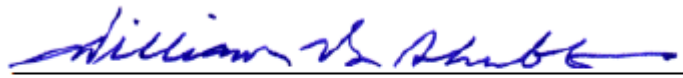
Discovery shall be completed by 6/5/2023

Motions shall be filed by 6/20/2023

Final Pretrial Conference set for 8/28/2023 at 1:30 PM (unchanged)

Jury Trial set for 10/31/2023 at 9:00AM (unchanged)

Dated: January 13, 2023



WILLIAM B. SHUBB

UNITED STATES DISTRICT JUDGE